

Pilot No. 1: Reference Alternative Documents

Focus: Consolidated Plan Document

Purpose:

To evaluate whether referencing and/or substituting existing local plans for Consolidated Plan components reduces grantees' administrative burdens. Grantees will work with HUD to determine whether their strategy meets regulatory requirements.

Participants:

San Mateo County, CA; Cupertino, CA; Elk Grove, CA; Richmond, CA; Miami Beach, FL; Gwinnett County, GA

Pilot Description:

Certain components of a Consolidated Plan can duplicate existing plans, such as local economic development, Continuum of Care, or local comprehensive plans. A streamlined Consolidated Plan could incorporate or link to these existing documents, rather than burden grantees with developing redundant components.

Participants in this pilot include State, county, and city grantees that need to submit Consolidated Plans in 2003 and will work with the CPD State Office Directors. They will:

1. Compile alternative strategies for referencing local plans, these may include existing techniques as well as new ideas
2. Work with HUD staff, the pilot group would determine whether these strategies meet regulatory and statutory requirements
3. Finally, drawing on strategies that meet HUD requirements, pilot group members would prepare a Consolidated Plan incorporating or referring to existing local plans

Summary of Grantee Pilots:

San Mateo County, CA; Cupertino, CA; Elk Grove, CA; Richmond, CA, all these grantees will take this opportunity to streamline the Consolidated Plan. Their goals are to develop Consolidated Plans that are more concise, easier to read, and to cross-reference other reports. Most of the information that will be cross-referenced will be from the Housing Element. Many of the grantees will post other documents (i.e. Citizen Participation Plan, past Consolidated Plans, Housing Element, Continuum of Care Plan, etc.) on their website for public access. When possible, grantees will use charts, tables, and summaries of information (bullet points). Grantees may include appendices, which would also make the Consolidated Plan a more concise document.

Miami Beach, FL planned to reference other documents to streamline the data and narrative information and make it easier to understand by citizens, other city staff, and local HUD staff.

Gwinnett County, GA will combine two similar plans (State's Comprehensive Plan and HUD's Consolidated Plan) into one document that meets requirements of both. This goes beyond referencing existing plans by combining the requirements of two plans into one document.

Pilot No. 1 Status as of June 30, 2004

City of Cupertino, CA Consolidated Plan incorporated references to other documents such as the Housing Element, the Countywide Continuum of Care Plan, and Analysis of Impediments among others. Although staff could not compare the planning process to previous years, the City believes that the level of detail was streamlined but included all required data. Staff time required to prepare the document was reduced. A copy of their plan can be viewed at: <http://www.eplans.org/misc/cdbg/>.

Elk Grove, CA Consolidated Plan was streamlined by providing data highlights in a bulleted format along with references to existing documents for detail when necessary. It was advantageous to post the Consolidated Plan and referenced documents on the City's CDBG website. Staff was able to create the Consolidated Plan in a short amount of time because of the flexibility in providing information through references and tables.

San Mateo County, CA Consolidated Plan incorporated tables with bullet-pointed items as well as references to other relevant documents. The final product had fewer pages than the previous Consolidated Plan.

Richmond, CA stated that while preparation of the Consolidated Plan was underway, the City could not fully streamline the document due to time constraints.

Miami Beach, FL Consolidated Plan referenced other documents (i.e.) North Beach Neighborhood Revitalization Strategy, City's Growth Management Plan, and Local Housing Assistance Plan. This strategy made it easier to understand by citizens, other city staff and local HUD staff. The Plan included a concise Table of Content and Appendices that ultimately enhanced comprehension.

Gwinnett County, GA is continuing to work with State and local officials to review how to integrate new State Comprehensive Plan requirements and the requirements of the Consolidated Plan. For example, the State of Georgia now requires local Comprehensive Plans include a housing element that provides data on persons with special housing needs (e.g., residents who are elderly; homeless; victims of domestic violence; migrant farm workers; persons with mental, physical, or developmental disabilities; persons with HIV/AIDS; and persons recovering from substance abuse; a description of extent to which owner and renter households are cost burdened and severely cost burdened; and

public participation requirements that include a minimum of two public hearings prior to submittal of plans.

CPD reviewers found the documents shorter, more readable, and user-friendly. Overall, the use of formatting, tables, bullet points, and cross-references significantly reduced the number of pages, while maintaining all of the required data. The County of San Mateo and the Cities of Cupertino and Elk Grove successfully utilized references to existing documents and bullet point lists to clearly outline Consolidated Plan goals. The City of Richmond, while not significantly streamlining the Consolidated Plan, was able to identify several areas of improvement in the Planning process. CPD will use participant feedback in combination with the Pilot experience to further pursue effective and efficient methods of preparing a concise Consolidated Plan that clearly outlines the community development needs and strategies of our grantees.

A review of the Gwinnett County pilot suggests the new process will be more meaningful, reduce staff time, overall cost to complete the plans, and result in a more integrated planning process. A combined plan will address all the State and HUD planning requirements and will eliminate duplicative similar plans. Georgia Department of Community Affairs staff liked the pilot idea so much, that they are encouraging other Entitlement Cities and Urban Counties to consider using a combined plan. The Atlanta CPD Office and the Georgia Department of Community Affairs have issued letters in June 2004 to Gwinnett County approving the use of the combined plan format. One addition discussion topic was the plan period. The State Plan is normally 10 years with a 5-year update. Unless prohibited by HUD, County staff recommend this as the period for the new plan. The County staff recommends this plan period option should be available to grantees, in-lieu-of the 5-year plan maximum now imposed on grantees by HUD. By having the 5-year update feature, this would permit necessary updating at the mid-point of the plan. In Gwinnett County the State Comprehensive Plan is updated at least every two years, by local choice and every 5 years, per State requirement. Similarly, the Action Plan prepared annually for HUD also includes any updates or data, needs, etc. This is also recommended as a part of the plan results.